

WWR#40396340

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

BABCOX MEDIA, INC.	)	CASE NO. 5:19-cv-01786
	)	
PLAINTIFF,	)	Judge LIOI
vs.	)	
	)	
	)	<b>MOTION FOR LEAVE TO FILE</b>
TFI ENVISION, INC., ET AL.	)	<b>AMENDED COMPLAINT</b>
	)	
DEFENDANTS	)	
	)	

Now comes Plaintiff Babcox Media, Inc. (“Babcox”), by counsel, and pursuant to the October 4, 2019 Order of this Honorable Court and Civ.R. 15, moves the court for leave to file an Amended Complaint in this in action within the next thirty (30) days. This action was originally filed in the Summit County, Ohio Court of Common Pleas in accordance with Ohio’s notice pleading procedure, before being removed by Defendant TFI Envision, Inc. (“TFI”) to this United States District Court. Thereafter, TFI filed a Motion to Dismiss, noting, *inter alia*, Plaintiff’s alleged failure to plead facts supporting personal jurisdiction and claims against TFI. The Court’s October 4, 2019 Order notes Plaintiff’s Motion to Dismiss, and Plaintiff’s desire to file an Amended Complaint, which discussed in the Planning Report submitted by the parties.

Accordingly, Plaintiff requests that the Court grant it leave to file an Amended Complaint within 30 days, or on or before November 8, 2019. Granting this short leave will further the interests of justice, without unduly delaying this proceeding or causing prejudice to any party.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed on the 8<sup>th</sup> day of October, 2019, and served electronically upon Counsel of record by the Court's electronic filing system on the day this

Notice was accepted for filing:

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*s/Roy J. Schechter*

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